

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
CINCINNATI DIVISION

ALEXANDRIA HAINES, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

CENGAGE LEARNING, INC.,

Defendant.

Case No. 1:24-cv-00710-MWM-KLL

PLAINTIFF'S NOTICE OF SUPPLEMENTAL AUTHORITY

Plaintiff Alexandria Haines respectfully submits *Salazar v. Paramount Glob.*, No. 23-5748, 2025 WL 1000139 (6th Cir. Apr. 3, 2025), as supplemental authority in further support of her Opposition to Defendant's Motion to Dismiss.

In *Salazar*, the Sixth Circuit examined whether a website's disclosure of a subscriber's "private video-viewing history to Facebook—bears a close relationship to intangible harms traditionally recognized as providing a basis for lawsuits in American courts." (*Salazar*, at Page 5.) The Sixth Circuit affirmed the district court, finding that Article III standing arose from the plaintiff's injury that "resembles the harms addressed by [public disclosure of private facts and intrusion upon seclusion] torts because he alleges that Paramount disclosed his private information to Facebook without his knowledge or consent." (*See id.*)

The *Salazar* decision is relevant to Plaintiff's argument that she adequately alleged "an injury-in-fact." (*See* ECF No. 13 at PageID 88).

Respectfully submitted,

**O'CONNOR, HASELEY AND WILHELM,
LLC**

Dated: April 15, 2025

/s/ Daniel J. O'Connor

Ohio Supreme Court No. 0091397

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CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will provide electronic notification of such filing to all parties of record.

/s/ Daniel J. O'Connor